

**California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348**

FACT SHEET

January 18, 2002

ITEM: 2

SUBJECT: Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region, Urban Storm Water Runoff Management Program, Orange County, Order No. R8-2002-0010 (NPDES No. CAS 618030)

I. INTRODUCTION

The 1972 Clean Water Act (CWA) established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate the discharge of pollutants from point sources to waters of the United States (U.S.). Since then, considerable strides have been made in reducing conventional forms of pollution, such as from sewage treatment plants and industrial facilities, through the implementation of the NPDES program and other federal, state and local programs. The adverse effects of some of the persistent toxic pollutants (DDT, PCB, TBT) were addressed through manufacturing and use restrictions and through cleanup of contaminated sites. On the other hand, pollution from land runoff (including atmospheric deposition, urban, suburban and agricultural) was largely unabated until the 1987 CWA amendments. As a result, diffuse sources, including urban storm water runoff, now contribute a larger portion of many kinds of pollutants than the more thoroughly regulated sewage treatment plants and industrial facilities. The National Urban Runoff Program (NURP) final report to the Congress (U.S. EPA, 1983) concluded that the goals of the CWA could not be achieved without addressing urban runoff discharges. The 1987 CWA amendments established a framework for regulating urban storm water runoff. Pursuant to these amendments, the Santa Ana Regional Water Quality Control Board (Regional Board) began regulating municipal storm water runoff in 1990.

The attached pages contain information concerning an application for renewal of Waste Discharge Requirements and a NPDES permit, which prescribe waste discharge requirements for urban storm water runoff from the cities and unincorporated areas in Orange County within the jurisdiction of the Santa Ana Regional Board. On September 1, 2000, the County of Orange and the Orange County Flood Control District (OCFCD), in cooperation with the cities of Anaheim, Brea, Buena Park, Costa Mesa, Cypress, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Laguna Woods, La Habra, La Palma, Lake Forest, Los Alamitos, Newport Beach, Orange, Placentia, Santa Ana, Seal Beach, Stanton, Tustin, Villa Park, Westminster, and Yorba Linda (hereinafter collectively referred to as permittees or dischargers), submitted NPDES Application No. CAS 618030 (Report of Waste Discharge) for reissuance of their areawide storm water NPDES permit. The permit application was submitted in accordance with the requirements of the previous NPDES permit (Order No. 96-31, NPDES No. CAS618030) which expired on March 1, 2001. Additionally, the permit application follows guidance provided by staff of the State Water Resources Control Board (State Board), the Regional Water Quality Control Boards (Regional Boards), and the United States Environmental Protection Agency (U.S. EPA).

On March 5, 2001, Order No. 96-31, NPDES No. CAS618030, was administratively extended in accordance with 40 CFR Part 122.6 and Title 23, Division 3, Chapter 9, §2235.4 of the California Code of Regulations.

Order No. R8-2002-0010 regulates discharges of urban storm water from the lower Santa Ana watershed to waters of the U.S., which ultimately drain into the Pacific Ocean.

II. REGULATORY BACKGROUND/CLEAN WATER ACT REQUIREMENTS

Urban runoff includes dry and wet weather flows from urbanized areas through a storm water conveyance system. As water flows over streets, parking lots, construction sites, and industrial, commercial, residential and municipal areas, it can intercept pollutants from these areas and transport them to waters of the U.S. If appropriate pollution control measures are not implemented, urban runoff may contain pathogens (bacteria, protozoa, viruses), sediment, trash, fertilizers (nutrients, mostly nitrogen and phosphorus compounds), oxygen-demanding substances (decaying matter), pesticides (DDT, Chlordane, Diazinon, Chlorpyrifos), heavy metals (cadmium, chromium, copper, lead, zinc) and petroleum products (oil & grease, PAHs, petroleum hydrocarbons). If not properly managed and controlled, urbanization can change the stream hydrology and increase pollutant loading to receiving waters. As a watershed undergoes urbanization, pervious surface area decreases, runoff volume and velocity increase, riparian and wetland habitat decrease, the frequency and severity of flooding increase and pollutant loading increases. Most of these impacts are due to human activities that occur during and/or after urbanization. The pollutants and hydrologic changes can cause declines in aquatic resources, toxicity to marine organisms, and impact human health and the environment.

However, properly planned high-density development, with sufficient open space, can reduce urban sprawl and problems associated with sprawl. Urban in-fill development can be an element of smart growth, creating the opportunity to maintain relatively natural open space elsewhere in the area.

The U.S. EPA recognizes urban runoff as the number one source of estuarine pollution in coastal communities¹. Recent studies² conducted in the Southern California area have reported a definite link between storm water runoff from urban areas and pollution in nearshore zones. A number of Orange County beaches were closed during 1999 and 2000 due to microbial contamination. One of the studies conducted to determine the source of this microbial contamination indicated that urban runoff may be one of the sources of this contamination. If not properly controlled, urban runoff could be a significant source of pollutants in waters of the U.S. Table 1 includes a list of pollutants, their sources, and some of the adverse environmental consequences mostly resulting from urbanization.

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¹ US EPA, 1999, 40CFR Parts 9, 122, 123, 124, National Pollutant Discharge Elimination System – Regulations for Revision of the Water Pollution Control Program Addressing Storm Water Discharges; Final Rule, 64FR 68727.

² Bay, S., Jones, B. H. and Schiff, K, 1999, Study of the Impact of Stormwater Discharge on Santa Monica Bay. Sea Grant Program, University of Southern California; and Haile, R.W., et. al., 1996, An Epidemiological Study of Possible Adverse Health Effects of Swimming in Santa Monica Bay.

Table 1³. Pollutants/Impacts of Urbanization on Waters of the U.S. (Marine Pollution)

Pollutants	Sources	Effects and Trends
Toxins (e.g., biocides, PCBs, trace metals, heavy metals)	Industrial and municipal wastewaters; runoff from farms, forests, urban areas, and landfills; erosion of contaminated soils and sediments; vessels; atmospheric deposition	Poison and cause disease and reproductive failure; fat-soluble toxins may bioconcentrate, particularly in birds and mammals, and pose human health risks. Inputs into U.S. waters have declined, but remaining inputs and contaminated sediments in urban and industrial areas pose threats to living resources.
Pesticides (e.g., DDT, diazinon, chlorpyrifos)	Urban runoff, agricultural runoff, commercial, industrial, residential, and farm use	Legacy pesticide (DDT, Chlordane, Dieldrin, etc.) use has been banned; still persists in the environment; some of the other pesticide uses are curtailed or restricted.
Biostimulants (organic wastes, plant nutrients)	Sewage and industrial wastes; runoff from farms and urban areas; nitrogen from combustion of fossil fuels	Organic wastes overload bottom habitats and deplete oxygen; nutrient inputs stimulate algal blooms (some harmful), which reduce water clarity, cause loss of seagrass and coral reef, and alter food chains supporting fisheries. While organic waste loadings have decreased, nutrient loadings have increased.
Petroleum products (oil, grease, petroleum hydrocarbons, PAHs)	Urban runoff and atmospheric deposition from land activities; shipping and tanker operations; accidental spills; coastal and offshore oil and gas production activities; natural seepage; PAHs from internal combustion engines	Petroleum hydrocarbons can affect bottom organisms and larvae; spills affect birds, mammals and nearshore marine life. While oil pollution from ships, accidental spills, and production activities has decreased, diffuse inputs from land-based activities have not.
Radioactive isotopes	Atmospheric fallout, industrial and military activities	Few known effects on marine life; bioaccumulation may pose human health risks where contamination is heavy.
Sediments	Erosion from farming, construction activities, forestry, mining, development; river diversions; coastal dredging and mining	Reduce water clarity and change bottom habitats; carry toxins and nutrients; clog fish gills and interfere with respiration in aquatic fauna. Sediment delivery by many rivers has decreased, but sedimentation poses problems in some areas; erosion from coastal development and sea-level rise is a future concern.

³ Adapted from “Marine Pollution in the United States” prepared for the Pew Oceans Commission, 2001.

Plastics and other debris	Ships, fishing nets, containers, trash, urban runoff	Entangles marine life or is ingested; degrades beaches, wetlands and nearshore habitats. Floatables (from trash) are an aesthetic nuisance and can be a substrate for algae and insect vectors.
Thermal	Cooling water from power plants and industry, urban runoff from impervious	Kills some temperature-sensitive species; displaces others. Generally, less a risk to marine life than thought 20 years ago.
Noise	Vessel propulsion, sonar, seismic prospecting, low-frequency sound used in defense and research	May disturb marine mammals and other organisms that use sound for communication.
Pathogens (bacteria, protozoa, viruses)	Sewage, urban runoff, livestock, wildlife, discharges from boats and cruise ships	Pose health risks to swimmers and consumers of seafood. Sanitation has improved, but standards have been raised.
Alien species	Ships and ballast water, fishery stocking, aquarists	Displace native species, introduce new diseases; growing worldwide problem.

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The Clean Water Act (CWA) prohibits the discharge of any pollutant to navigable waters from a point source unless an NPDES permit authorizes the discharge. Efforts to improve water quality under the NPDES program traditionally and primarily focused on reducing pollutants in discharges of industrial process wastewater and municipal sewage. The 1987 amendments to the CWA required municipal separate storm sewer systems (MS4s) and industrial facilities, including construction sites, to obtain NPDES permits for storm water runoff from their facilities. On November 16, 1990, the United States Environmental Protection Agency (EPA) promulgated the final Phase I storm water regulations. The storm water regulations are contained in 40 CFR Parts 122, 123 and 124.

The areawide NPDES permit for Orange County areas within the Santa Ana Regional Board's jurisdiction is being considered for renewal in accordance with Section 402 (p) of the CWA and all requirements applicable to an NPDES permit issued under the issuing authority's discretionary authority. The requirements included in this order are consistent with the CWA, the federal regulations governing urban storm water discharges, the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), the California Water Code, and the State Board's Plans and Policies.

The Basin Plan is the basis for the Regional Board's regulatory programs. The Plan was developed and is periodically reviewed and updated in accordance with relevant federal and state law and regulation, including the Clean Water Act and the California Water Code. As required, the Basin Plan designates the beneficial uses of the waters of the Region and specifies water quality objectives intended to protect those uses. (Beneficial uses and water quality objectives, together with an antidegradation policy, comprise federal "water quality standards"). The Basin Plan also specifies an implementation plan, which includes certain discharge prohibitions. In general, the Basin Plan makes no distinctions between wet and dry weather conditions in designating beneficial uses and setting water quality objectives, i.e., the beneficial uses, and correspondingly, the water quality objectives are assumed to apply year-round. (Note: In some cases, beneficial uses for certain surface waters are designated as "I", or intermittent, in recognition of the fact that surface flows (and beneficial uses) may be present only during wet weather.) Most beneficial uses and water quality objectives were established in the 1971, 1975 and 1983 Basin Plans.

Water Code Section 13241 requires that certain factors be considered, at a minimum, when water quality objectives are established. These include economics and the need for developing housing in the Region. (The latter factor was added to the Water Code in 1987).

During this permit development process, the permittees raised an issue regarding compliance with Section 13241 of the California Water Code with respect to water quality objectives for wet weather conditions, specifically the cost of achieving compliance during wet weather conditions and the need for developing housing within the Region and its impact on urban storm water runoff. During the next review of the Basin Plan, staff will recommend that this matter be incorporated on the triennial review list. In the meantime, the provisions of this order will result in reasonable further progress towards the attainment of the existing water quality objectives, in accordance with the discretion in the permitting authority recognized by the United States Court of Appeals for the Ninth Circuit in *Defenders of Wildlife v Browner*, 191 F.3d 1159, 1164 (9th Cir. 1999).

III. BENEFICIAL USES

Storm water flows that are discharged to municipal storm drain systems in Orange County are tributary to various water bodies (inland surface streams, bays and tidal prisms, ocean waters, and lakes and reservoirs) of the state. The beneficial uses of these water bodies include municipal and domestic supply, agricultural supply, industrial service and process supply, groundwater recharge, navigation, hydropower generation, water contact recreation, non-contact water recreation, commercial and sportfishing, warm freshwater habitat, cold freshwater habitat, preservation of biological habitats of special significance, wildlife habitat, preservation of rare, threatened or endangered species, marine habitat, shellfish harvesting, spawning, reproduction and development of aquatic habitats and estuarine habitat. The ultimate goal of this storm water management program is to protect the beneficial uses of the receiving waters.

IV. PERMITTED AREA

The permitted area is delineated by the Los Angeles County-Orange County boundary line on the northwest, the San Bernardino-Orange County boundary line on the north and northeast, the Riverside County-Orange County boundary line on the east, the Santa Ana Regional Board-San Diego Regional Board boundary line on the southeast, and the Pacific Ocean on the southwest (see Attachment A of the order). The permittees serve a population of approximately 2.8 million, occupying an area of approximately 786 square miles (including unincorporated areas and the limits of 33 cities, 25 of which are within the Santa Ana Regional Board's jurisdiction). The permittees have jurisdiction over, and/or maintenance responsibility for, storm water conveyance systems within Orange County. The County's systems include an estimated 400 miles of storm drain systems. A major portion of the urbanized areas of Orange County drains into water bodies within this Regional Board's jurisdiction. Storm water discharges from urbanized areas consist mainly of surface runoff from residential, commercial, and industrial developments. In addition, there are storm water discharges from agricultural land uses, including farming and animal operations. However, the CWA specifically excludes agricultural discharges from regulation under this program. Other areas of the County not addressed or which are excluded by the storm water regulations and areas not under the jurisdiction of the permittees are excluded from the area requested for coverage under this permit. This includes the following areas and activities:

- Federal lands and state properties, including, but not limited to, military bases, national forests, hospitals, schools, colleges, universities, and highways;
- Native American tribal lands; and
- Utilities and special district properties.

Discharges from the permitted area drain into the Pacific Ocean. The watershed regulated under this order is generally referred to as the Lower Santa Ana River Basin.

V. WATERSHED MANAGEMENT/LOWER SANTA ANA RIVER BASIN

To manage the water resources of the Region efficiently, it is critical to have a holistic approach. The entire storm drain system in Orange County is not controlled by a single entity; the County of Orange, the OCFCD, several cities, Caltrans, U.S. Army Corps of Engineers and a number of other entities own, operate and/or manage the storm drain systems. In addition to the cities, the County

and the OCFCD, there are a number of other significant contributors of storm water runoff to these storm drain systems. These include: large institutions such as the State University facilities, schools, hospitals, etc.; federal facilities such as Department of Defense facilities; State agencies such as Caltrans; water and wastewater management agencies such as Orange County Water District, Metropolitan Water District etc.; the National Forest Service; state parks; and entertainment centers such as Disneyland. The quality and quantity of storm water runoff into and out of Orange County also depends upon runoff from San Bernardino and Riverside County areas that are tributary to Orange County. Some of the runoff from Orange County enters systems controlled by other entities, such as the Los Angeles County Flood Control District, which is under the Los Angeles Regional Board's jurisdiction.

Some of these facilities, such as U.S. Marine Corps, Tustin and El Toro Air Stations, Disneyland and Caltrans, are already under individual permits for storm water runoff. The Los Angeles and San Diego Regional Boards have also issued areawide storm water permits for areas within their jurisdiction.

Cooperation and coordination among all the stakeholders are essential for efficient and economical management of the watershed. It is also critical to manage nonpoint sources at a level consistent with the management of urban storm water runoff in a watershed in order to prevent or remedy water quality impairment. Regional Board staff will facilitate coordination of monitoring and management programs among the various stakeholders, where necessary.

An integrated watershed management approach is consistent with the Strategic Plan and Initiatives (June 22, 1995) for the State and Regional Boards. A watershed wide approach is also necessary for implementation of the load and waste load allocations developed under the TMDL process (see Section B, below). The MS4 permittees and all the affected entities should be encouraged to participate in regional or watershed solutions instead of project-specific and fragmented solutions.

The pollutants in urban runoff originate from a multitude of sources and effective control of these pollutants requires a cooperative effort of all the stakeholders and many regulatory agencies. Every stage of urbanization should be considered in developing appropriate urban runoff pollution control methodologies. The program's success depends upon consideration of pollution control techniques during planning, construction and post-construction operations. At each stage, appropriate pollution prevention measures, source control measures and, if necessary, treatment techniques should be considered.

1. SUB-WATERSHEDS AND MAJOR CHALLENGES

The Lower Santa Ana River Watershed can be subdivided into five tributary watersheds:

- a. *The San Gabriel River Drainage Area:* Carbon Canyon Creek and Coyote Creek drain into the San Gabriel River. Only a portion of the San Gabriel River is within the Santa Ana Regional Board's jurisdiction. The River empties into the Pacific Ocean at the boundary between two Regional Boards (Regions 4 and 8). Region 4 regulates most of the discharges to the San Gabriel River.

The Los Angeles Regional Board (Region 4) listed the San Gabriel River as an impaired waterbody on the CWA Section 303(d) list of impaired waters. It is

listed for ammonia, toxicity, algae, eutrophication, pH, odors, low dissolved oxygen, trash, lead, arsenic, copper, silver, mercury (tissue), coliform, DDT, PCBs, chlordane, and abnormal fish histology. A trash TMDL for the East Fork of the River was adopted by the Regional Board (Region 4) and approved by the US EPA. A nutrient TMDL is scheduled for adoption in November 2002, a coliform TMDL for May 2003, and a metals TMDL for June 2005.

- b. The Huntington Harbour and Bolsa Bay Drainage Area: This includes Anaheim Bay, Huntington Harbour, Bolsa Bay, and Bolsa Chica Ecological Reserve. A number of flood control channels discharge into this area, including Anaheim-Barber, East Garden Grove-Wintersberg, and Bolsa Chica Channel. The area historically had a number of oil production facilities and an oil-well drilling mud disposal area. There are still some production wells in the area. Certain areas of the Bolsa Chica wetlands have been impacted by the oil production and related activities in the area. The drilling mud disposal area has been cleaned up, and there is a collaborative effort of a number of state, federal, and local agencies and other entities to restore the Bolsa Chica wetlands.

Anaheim Bay and Huntington Harbour are listed as impaired waterbodies (see Table 2), and TMDLs will be developed to address the pollutants causing the impairment.

- c. The Santa Ana River Drainage Area: This includes Santa Ana River Reaches 1 and 2, Santiago Creek Reaches 1, 2, 3 and 4, Silverado Creek, Black Star Creek, Talbert Channel, Talbert Marsh and Greenville-Banning Channel. The major problem for the area is microbial contamination of the coastal zone. The initial studies conducted by the Orange County Sanitation District determined that their facilities were probably not the cause of the microbial problems in the nearshore zone. Subsequently, the Executive Officer issued a directive to the County of Orange and the cities of Santa Ana, Costa Mesa, Fountain Valley and Huntington Beach (urban storm water dischargers to this tributary area) under Section 13267 of the Water Code. This directive required the dischargers to provide a plan to identify, characterize and control sources that contributed to the microbial problems in the Huntington Beach area. The first phase of this study is complete, and the second phase is underway. The first phase of the study indicated that urban runoff, including dry weather flows, may be a contributor to this microbial problem. Some of the dry weather flows from the flood control channels are now being diverted to the sanitary sewer. However, other sources of contamination are also suspected and the second phase of the study is intended to further investigate these sources.

The Executive Officer issued a Cleanup and Abatement Order to the City of Huntington Beach requiring the City to investigate any leaking sanitary sewers in the area and to determine if exfiltration from these sources to storm sewer systems or to ocean waters through other channels was causing or contributing to the microbial problems at Huntington State and City beaches. This investigation is also currently under way.

The Orange County Sanitation District is investigating the impact of its ocean discharge (treated sanitary wastewater) on nearshore microbial problems at Huntington Beach.

It is expected that a combination of requirements included in this order and the programs discussed above will address the urban runoff pollution problems in this sub-watershed.

- d. The Newport Bay Drainage Area: Tributaries include Bonita Creek, Serrano Creek, Peters Canyon Wash, Hicks Canyon Wash, Bee Canyon Wash, Borrego Canyon Wash, Agua Chinon Wash, Laguna Canyon Wash, Rattlesnake Canyon Wash, Sand Canyon Wash, San Diego Creek Reaches 1 and 2, and San Joaquin Freshwater Marsh.

The Newport Bay watershed has a number of impaired waterbodies listed under Section 303(d) of the CWA (see Section 2, below for details). The impairments are mostly due to nutrients, sediment, pesticides, pathogens and metals. To date, TMDLs have been developed for nutrients, sediment, and fecal coliform bacteria. These TMDLs are being implemented. Recent monitoring data indicate that the target goals for nutrients for the year 2007 are now being met.

Other TMDLs for the Newport Bay watershed are being developed by the Regional Board (for diazinon, chlorpyrifos and selenium) and U.S. EPA (for legacy pesticides and other metals).

The Irvine Ranch Water District (IRWD), which provides sewage collection and treatment services for most areas in this watershed, has been also accepting dry weather flows from some of the storm sewer systems. Recently, IRWD proposed to construct a number of water quality treatment wetlands for treating urban storm water runoff. These treatment wetlands would be strategically located to capture and treat flows from different portions of the watershed. The IRWD is also exploring the possibility of sponsoring legislation that would authorize the District to collect storm water fees. These treatment wetlands are expected to remove sediment and nutrients from urban runoff but may be less efficient in removing pathogens and toxics (metals, pesticides, etc.). It is anticipated that a combination of other best management practices and these treatment wetlands will help to control the discharge of pollutants in urban runoff.

- e. Irvine Coast and Newport Coast Areas of Special Biological Significance (ASBSs) The Ocean Plan has 35 designated areas of special biological significance throughout the State; two of these ASBSs are within the Santa Ana Region, Irvine Coast Areas of Special Biological Significance, Newport Coast Areas of Special Biological Significance. The ASBSs require protection of species or biological communities to the extent that alteration of natural water quality is undesirable. The Crystal Cove area, which is within the Irvine Coast ASBS, is currently experiencing increased urban runoff from new developments in the area. The Ocean Plan contains a prohibition on discharges of wastes to ASBS. Regional Board staff identified a number of dischargers potentially violating or threatening to violate this Ocean Plan discharge prohibition in the Crystal Cove area. These dischargers included The Irvine Company, California Department of Transportation, and the California Department of Parks and Recreation. On November 16, 2000, the Regional Board adopted Cease and Desist Order No. 00-87 requiring these dischargers to cease and desist from any violations of the waste discharge prohibition. All future waste discharges to the

ASBS governed by the prohibition in the Ocean Plan are prohibited and a time schedule is provided in the Cease and Desist order to eliminate the existing waste discharges.

2. CWA SECTION 303(d) LIST AND TMDLs:

The 1998 water quality assessment conducted by the Regional Board identified a number of waterbodies within the Region as impaired waterbodies, under Section 303(d) of the CWA. These are waterbodies where the designated beneficial uses are not met and/or the water quality objectives are being violated. These waterbodies were placed on the CWA Section 303(d) list of impaired waters. The impaired waterbodies in Orange County within the Santa Ana Regional Board's jurisdiction are listed in Table 2.

Federal regulations require that a total maximum daily load (TMDL) be established for each 303(d) listed waterbody for each of the pollutants causing impairment. The TMDL is the total amount of the problem pollutant that can be discharged while water quality standards in the receiving water are attained, i.e., water quality objectives are met and the beneficial uses are protected. It is the sum of the individual wasteload allocations (WLA) for point source inputs, load allocations (LA) for non-point source inputs and natural background, with a margin of safety. The TMDLs are the basis for limitations established in waste discharge requirements. TMDLs have been developed for sediment and nutrients for San Diego Creek and Newport Bay and for fecal coliform bacteria in Newport Bay. The stakeholders in this watershed are collaborating in the development and implementation of the TMDLs. The Regional Board's Executive Officer has issued requirements for the submittal and implementation by the responsible parties of plans and schedules to address the TMDL requirements. To avoid any duplicative efforts, this permit does not include any further implementation requirements based on TMDLs. However, this permit may be reopened to include TMDL implementation, if other implementation methodologies are not effective.

Table 2. Clean Water Act Section 303(d) Listed Waterbodies

Water Body	Hydro Unit	Pollutant Stressor	Source	Priority	Size Affected	Unit	TMDL End Date
Anaheim Bay	801.110	Metals	Urban Runoff/Storm Sewers, Unknown Nonpoint Source	Medium	180	Acres	0111
		Pesticides	Unknown Nonpoint Source	Medium	180	Acres	0111
Huntington Harbour	801.110	Metals	Urban Runoff/Storm Sewers, Boatyards	Medium	150	Acres	0111
		Pathogens	Urban Runoff/ Storm Sewers	Medium	150	Acres	0111
		Pesticides	Unknown Nonpoint Source	Medium	150	Acres	0111

Newport Bay, Lower	801.110	Metals	Urban Runoff/Storm Sewers, Contaminated Sediments, Boatyards	High	700	Acres	0107
		Nutrients	Agriculture, Urban Runoff/Storm Sewers	High	700	Acres	0198
		Pathogens	Urban Runoff/Storm Sewers	High	700	Acres	0100
		Pesticides	Agriculture, Contaminated Sediments	High	700	Acres	0102
		Priority Organics	Contaminated Sediments, Unknown Nonpoint Source	High	700	Acres	0102
Upper Newport Bay Ecological Reserve	801.110	Metals	Urban Runoff/Storm Sewers	High	752	Acres	0102
		Nutrients	Agriculture, Urban Runoff/Storm Sewers, Groundwater Loadings	High	752	Acres	0198
		Pathogens	Urban Runoff/Storm Sewers	High	752	Acres	0100
		Pesticides	Agriculture, Unknown Nonpoint Source	High	752	Acres	0102
		Sedimentation/Siltation	Agriculture, Construction/Land Development, Channel Erosion, Erosion/Siltation	High	752	Acres	0198
San Diego Creek, Reach 1	801.110	Metals	Unknown Nonpoint Source	High	6	Miles	0102
		Nutrients	Agriculture, Urban Runoff/Storm Sewer, Groundwater Loadings	High	6	Miles	0198
		Pesticides	Unknown Nonpoint Source	High	6	Miles	0102
		Sedimentation/Siltation	Agriculture, Construction/Land Development, Channel Erosion, Erosion/Siltation	High	6	Miles	0198

San Diego Creek Reach 2	801.110	Metals	Urban Runoff/Storm Sewer	High	6	Miles	0102
		Nutrients	Agriculture, Urban Runoff/Storm Sewer, Groundwater Loadings	High	6	Miles	0198
		Sedimentation/Siltation	Agriculture, Construction/Land Development, Channel Erosion, Erosion/Siltation	High	6	Miles	0198
		Unknown Toxicity	Unknown Nonpoint Source	High	6	Miles	0102
Santiago Creek R4	801.120	Salinity/TDS/Chlorides	Source Unknown	Low	2	Miles	0111
Silverado Creek	801.120	Pathogens	Unknown Nonpoint Source	Low	2	Miles	0111
		Salinity/TDS/Chlorides	Unknown Nonpoint Source	Low	2	Miles	0111

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VI. FIRST AND SECOND TERM PERMITS: STORM WATER POLLUTION CONTROL PROGRAMS/POLICIES

Prior to EPA's promulgation of the final storm water regulations, the counties of Orange, Riverside and San Bernardino applied for areawide NPDES permits for storm water runoff. On July 13, 1990, the Regional Board issued Order No. 90-71 to the permittees (first term permit). In 1996, the Board adopted Order No. 96-31 (second term permit). First and second term permits included the following requirements as outlined in the storm water regulations:

1. Prohibited non-storm water discharges to the MS4s, with certain exceptions.
2. Required the municipalities to develop and implement a drainage area management plan (DAMP) to reduce pollutants in urban storm water runoff to the maximum extent practicable (MEP⁴).
3. Required the discharges from the MS4s to meet water quality standards in receiving waters.
4. Required the municipalities to identify and eliminate illicit connections and illegal discharges to the MS4s.
5. Required the municipalities to establish legal authority to enforce storm water regulations.
6. Required monitoring of dry weather flows, storm flows, and receiving water quality, and required program assessment.

The following programs and policies have been implemented or are being implemented by the permittees. During the first term permit, the permittees developed a Drainage Area Management Plan (1993 DAMP) which was approved by the Executive Officer of the Regional Board on April 29, 1994. The 1993 DAMP included a number of best management practices (BMPs) and a very extensive public education program. The monitoring program for the first term permit included 89 monitoring stations within streams and flood control channels and 21 stations within the bays, estuaries and the ocean. The findings and conclusions from these monitoring stations and monitoring programs of other municipal permittees (Riverside and San Bernardino Counties and others) have been used to identify problem areas and to re-evaluate the monitoring program and the effectiveness of the BMPs. The future direction of some of these program elements will depend upon the results of the ongoing studies and a holistic approach to watershed management.

Other elements of the storm water management program included identification and elimination of illegal/illicit discharges and establishment of adequate legal authority to control pollutants in storm water discharges. The permittees have completed a survey of their storm drain systems to identify illegal/illicit connections and have adopted appropriate ordinances to establish legal authority. Some of the more specific achievements during the first and second term permits are as follows:

1. *Interagency Agreements and Coordination*: Established a program management structure through an Interagency Implementation Agreement. Participated in regional monitoring programs and focused special studies/research programs. Worked with the County Sanitation Districts, Health Care Agency, Integrated Waste Management Agency, and the Water Districts to provide a consistent urban storm water pollution control message to the

⁴ Maximum Extent Practicable (MEP) means to the maximum extent feasible, taking into account equitable considerations of synergistic, additive, and competing factors, including but not limited to, gravity of the problem, technical feasibility, fiscal feasibility, public health risks, societal concerns, and social benefits.

public. Worked with Caltrans, other transportation agencies, the Storm Water Quality Task-Force, and others to further study and understand urban runoff problems and control measures.

2. Ordinances, Plans and Policies: Adopted a Model Water Quality Ordinance and Enforcement Consistency Guide; prepared a Water Pollution Enforcement Implementation Plan, Public Agency Activity BMP guideline, a Public Pesticide and Fertilizer Use guideline, Criteria for MS4 Inspections, and a Water Quality Monitoring Plan; and established a Technical Advisory Committee for overall program development and implementation.
3. Program Review: A number of existing programs were reviewed to determine their effectiveness in combating urban pollution and to recommend alternatives and or improvements, including litter control measures, street sweeping frequencies and methods, public agency activities and facilities, illegal and illicit connections to the MS4 systems, and existing monitoring programs.
4. Public Education: A number of steps were taken to educate the public, businesses, industries, and commercial establishments regarding their role in urban runoff pollution controls. The appropriate industrial dischargers were notified of the storm water regulatory requirements. For a number of unregulated activities, BMP guidance was developed (mobile detailing, automotive service centers, restaurants, pool maintenance). Finally, a countywide hotline was established for reporting any suspected water quality problems.
5. Public Agency Training: Training was provided to public agency employees on how to implement New Development Guidelines and Public Works BMPs, how to conduct investigations of reported water quality problems and how to conduct inspections of industrial facilities and public work projects. The municipal planners were trained to recognize water quality related problems in proposed developments.
6. Related Activities: Flood control channels were stabilized, sediment basins were constructed, and debris booms were installed; illegal connections were eliminated and illicit connections to the MS4s were documented and/or permitted.

VII. FIRST AND SECOND TERM PERMITS - WATER QUALITY IMPROVEMENTS

An accurate and quantifiable measurement of the impact of the above stated storm water management programs is difficult for a variety of reasons, such as the variability in chemical water quality data, the incremental nature of BMP implementation, lack of baseline monitoring data, and the existence of some of the programs and policies prior to initiation of formal storm water management programs. There are generally two accepted methodologies for assessing water quality improvements: (1) conventional monitoring such as chemical-specific water quality monitoring; and (2) non-conventional monitoring such as monitoring of the amount of household hazardous waste collected and disposed off at appropriate disposal sites, amount of used oil collected, debris removed by the debris boom, etc.

The water quality monitoring data collected during the first and second term permits did not indicate any discernible trends or significant changes. However, the non-conventional monitoring data indicate that other programs and policies have been very effective in keeping a significant quantity of wastes from being discharged into waters of the U.S.

During the second term permit, there was an increased focus on watershed management initiatives and coordination among the municipal permittees in Orange, Riverside and San Bernardino Counties. These efforts resulted in a number of regional monitoring programs and other coordinated program and policy developments.

It is anticipated that with continued implementation of the revised DAMP and other requirements specified in this order, the goals and objectives of the storm water regulations will be met, including protection of the beneficial uses of all receiving waters.

VIII. FUTURE DIRECTION/2000 DAMP

The NPDES permit renewal application included an updated DAMP (2000 DAMP) that includes programs and policies the permittees are proposing to implement during the third term permit. The 2000 DAMP is the principal guidance document for urban storm water management programs in Orange County and includes the following major components:

1. Continues to provide a framework for the program management activities and plan development.
2. Continues to provide the legal authority to control discharges to the MS4s.
3. Improves current BMPs to achieve further reduction in pollutant loading to the MS4s.
4. Includes programs and policies to increase public education processes and to seek public support for urban storm water pollution prevention BMPs.
5. Increases requirements for controls on new developments and significant redevelopments.
6. Continues to ensure that construction sites implement appropriate pollution control measures.
7. Continues to ensure that industrial sites are in compliance with storm water regulations.
8. Continues to include programs and policies to eliminate illegal discharges and illicit connections to the MS4s.
9. Continues to include monitoring of urban runoff.
10. Includes provisions for any special focus studies and/or control measures.

A combination of these programs and policies and the requirements specified in this order should ensure control of pollutants in storm water runoff from facilities owned and/or controlled by the permittees.

IX. PERMIT REQUIREMENTS

The legislative history of storm water statutes (1987 CWA Amendments), U.S. EPA regulations (40CFR Parts 122, 123, and 124), and clarifications issued by the State Water Resources Control Board (State Board Orders No. WQ 91-03 and WQ 92-04) indicate that a non-traditional NPDES permitting strategy was anticipated for regulating urban storm water runoff. Due to the economic and technical infeasibility of full-scale end-of-pipe treatments and the complexity of urban storm

water runoff quality and quantity, MS4 permits generally include narrative requirements for the implementation of BMPs in place of numeric effluent limits.

The requirements included in this order are meant to specify those management practices, control techniques and system design and engineering methods that will result in maximum extent practicable protection of the beneficial uses of the receiving waters. The State Board (Orders No. WQ 98-01 and WQ 99-05) concluded that MS4s must meet the technology-based maximum extent practicable (MEP) standard and water quality standards (water quality objectives and beneficial uses). The U.S. Court of Appeals for the Ninth Circuit subsequently held that strict compliance with water quality standards in MS4 permits is at the discretion of the local permitting agency. Any requirements included in the order that are more stringent than the federal storm water regulations are in accordance with the CWA Section 402(p)(3)(iii), and the California Water Code Section 13377 and are consistent with the Regional Board's interpretation of the requisite MEP standard.

The Report of Waste Discharge (ROWD) included a discussion of the current status of Orange County's urban storm water management program and the proposed programs and policies for the next five years (third term permit). The order incorporates these documents and the performance commitments made in the ROWD.

This order recognizes the significant progress made by the permittees during the first and second term permits in implementing the storm water regulations. The permit also recognizes regional and innovative solutions to such a complex problem. For these reasons, the order is less prescriptive compared to some of the MS4 NPDES permits for urban runoff issued by other Regional Boards. However, it should achieve the same or better water quality benefits because of the programs and policies already being implemented or proposed for implementation, including regional and watershed wide solutions.

The major requirements include: (1) Discharge prohibitions; (2) Receiving water limitations; (3) Prohibition on illicit connections and illegal discharges; (4) Public and business education; (5) Adequate legal authority; (6) Programs and policies for municipal facilities and activities; (7) Inspection Activities by the municipalities; (8) New development/re-development requirements; (9) Waste load allocations for nutrients, sediment, and fecal coliform bacteria; and, (10) Monitoring and reporting requirements.

These programs and policies are intended to improve urban storm water quality and protect the beneficial uses of receiving waters of the region.

1. DISCHARGE PROHIBITIONS

In accordance with CWA Section 402(p)(3)(B)(ii), this order prohibits the discharge of non-storm water to the MS4s, with a few exceptions. The specified exceptions are consistent with 40 CFR 122.26(d)(2)(iv)(B)(1). If the permittees or the Executive Officer determines that any of the exempted non-storm water discharges contain pollutants, a separate NPDES permit or coverage under the Regional Board's De Minimis permit will be required.

2. RECEIVING WATER LIMITATIONS

Receiving water limitations are included to ensure that discharges from MS4 systems do not cause or contribute to violations of applicable water quality standards in receiving waters. The compliance strategy for receiving water limitations is consistent with the U.S. EPA and State Board guidance and recognizes the complexity of storm water management.

This order requires the permittees to meet water quality standards in receiving waters in accordance with US EPA requirements as specified in State Board Order No. WQ 99-05. If

water quality standards are not met by implementation of current BMPs, the permittees are required to re-evaluate the programs and policies and to propose additional BMPs. Compliance determination will be based on this iterative BMP implementation/compliance evaluation process.

3. ILLEGAL DISCHARGES AND ILLICIT CONNECTIONS TO MS4s

The permittees have completed their survey of the MS4 systems and eliminated or permitted all identified illicit connections. The permittees have also established a program to address illegal discharges and a mechanism to respond to spills and leaks and other incidents of discharges to the MS4s. The permittees are required to continue these programs to ensure that the discharges from MS4s do not become a source of pollutants in receiving waters.

4. PUBLIC AND BUSINESS EDUCATION OUTREACH PROGRAM

Public outreach is an important element of the overall urban pollution prevention program. The permittees have committed to implement a strategic and comprehensive public education program to maintain the integrity of the receiving waters and their ability to sustain beneficial uses. The principal permittee has taken the lead role in the outreach program and has targeted various groups including businesses, industry, development, utilities, environmental groups, institutions, homeowners, school children, and the general public. The permittees have developed a number of educational materials, established a storm water pollution prevention hotline, started an advertising and educational campaign and distribute public education materials at a number of public events. The permittees are required to continue these efforts and to expand public participation and education programs.

5. LEGAL AUTHORITY

During the first two permit cycles, each permittee adopted a number of ordinances, municipal codes, and other regulations to establish legal authority to control discharges to the MS4s and to enforce these regulations as specified in 40 CFR 122.26(d)(2)(I)(B, C, E, and F). The permittees are required to enforce these ordinances and to take enforcement actions against violators (40 CFR 122.26(d)(2)(iv)(A-D)). The enforcement activities undertaken by a majority of the permittees have consisted primarily of Notices of Violation, which act to educate the public on the environmental consequences of illegal discharges. In the case of the County, additional action has sometimes included recovery of investigation and clean-up costs from a responsible party. In the event of egregious or repeated violations, the option exists for a referral to the County District Attorney for possible prosecution. In order to eliminate unauthorized, non-storm water discharges, reduce the amount of pollutants commingling with storm water runoff and thereby protect water quality, an additional level of enforcement is required between Notices of Violation and District Attorney referrals. Therefore, by November 15, 2003, the permittees are required to establish the authority and resources to administer either civil or criminal fines and/or penalties for violations of their local water quality ordinances (and the Federal Clean Water Act). The progress in establishing this program must be fully documented in the annual reports submitted by the permittees and the number, nature and amount of fines and/or penalties levied must be reported, beginning with the 2003/2004 annual report.

6. PUBLIC FACILITIES AND ACTIVITIES

Education of municipal planning, inspection, and maintenance staff is critical to ensure that municipal facilities and activities do not cause or contribute to an exceedance of receiving water quality standards. The second term permit required the permittees to prepare an Environmental Performance Report to address public agency facilities and activities that are not regulated under the State's General Industrial Activities Storm Water Permit. It also required the permittees to report on an annual basis the actions taken to eliminate the discharge of pollutants from public agency activities and facilities. The permittees are required to inspect and maintain drainage facilities free of waste materials to control pollutants in storm water runoff flowing through these systems. This order requires the permittees to re-evaluate their facilities and activities on an annual basis to see if additional BMPs are needed to ensure water quality protection.

7. MUNICIPAL INSPECTION PROGRAM

Inspections by the municipalities, of construction, industrial, and commercial activities within their jurisdiction will be conducted, in order to control the loading of pollutants entering the MS4 system. The municipalities will inventory companies and sites in the above categories; prioritize those companies and sites with respect to their potential for discharge of pollutants in runoff and their proximity to sensitive receiving waters; and perform regular inspections to insure compliance with local ordinances. While initial observations of non-compliance may result in 'educational' type enforcement, repeated non-compliance will result in more disciplinary forms of enforcement, such as, monetary penalties, stop work orders or permit revocation.

8. NEW DEVELOPMENT

During the second term permit, the permittees developed new development guidelines. The permittees are required to implement these guidelines. Additionally, this order requires the permittees to work towards the goal of restoring and preserving the natural hydrologic cycles in approving urban developments. To accomplish this goal, the permittees have the option of using a combination of methodologies. The permittees/project proponents may propose BMPs based on a watershed approach, establish a storm water pollution prevention fund for such BMPs, or any other innovative and proven alternatives to address storm water pollution. If a set of measures, acceptable to the Executive Officer, is not developed and approved by October 1, 2003, the permittees are required to use the numeric sizing criteria specified in this order. The numeric criteria are identical to the ones used by the San Diego Regional Board in its MS4 permit for permittees within the San Diego County area (Order No. 2001-01).

9. SEPTIC SYSTEM FAILURES AND PORTABLE TOILET DISCHARGES

A number of beach closures in Orange County have been due to spills, overflows, and leaks from sanitary sewer lines. To address these concerns, a set of separate waste discharge requirements for local sanitary sewer agencies is being prepared by the Regional Board. Failing septic systems and improper use of portable toilets have also been linked to microbial contamination of urban runoff. The permittees shall identify, with the appropriate local agency, a mechanism to determine if failure of these septic systems are causing or contributing to urban storm water pollution problems in their jurisdictions. The permittees shall also review their local oversight program for the placement and maintenance of portable toilets to determine the need for any revision.

10. MONITORING REQUIREMENTS

During the first term permit and part of the second term permit, the permittees conducted extensive monitoring of the storm water flows, receiving water quality and sediment quality. These early programs focused on identifying pollutants, estimating pollutant loads, tracking compliance with water quality objectives, and identifying sources of pollutants. The Orange County monitoring program, like other monitoring programs nationwide, has established that there is a high degree of uncertainty in the quality of storm water runoff and that there are significant variations in the quality of urban runoff spatially and temporally. However, most of the monitoring programs to date have indicated that there a number of pollutants in urban storm water runoff. Only in a few cases has a definite link between pollutants in urban runoff and beneficial use impairment been established.

In 1999, the permittees re-evaluated their monitoring program and proposed a revised monitoring program. The goals of the 1999 Water Quality Monitoring Program are:

- a. To determine the role of urban runoff in beneficial use impairment;
- b. To collect technical information to develop an effective urban storm water management plan; and
- c. To determine the effectiveness of a number of BMPs, also as an aid to the overall urban storm water management plan.

To accomplish these goals, the monitoring program focuses on three areas:

- a. Areas where constituent concentrations are substantially above system-wide averages. These areas are referred to as “warm spots” and the designation is based on monitoring data from prior years.
- b. Areas of Critical Aquatic Resources (sites with important aquatic resources).
- c. Sub-watersheds where certain BMPs have been installed to study their effectiveness.

To accomplish these goals, it is anticipated that at least five years worth of monitoring data will be required (1999-2003).

In addition, the monitoring program will continue the Reconnaissance and Source Identification component that targets areas that are known to exhibit unusually high levels of storm water pollutants.

The permittees also participate in a number of other regional monitoring programs such as those conducted by the Southern California Coastal Water Research Project and the California Regional Marine Monitoring Program.

The permittees are encouraged to continue their participation in regional and watershed-wide monitoring programs. By July 1, 2003, the permittees are required to re-evaluate their Water Quality Monitoring Program and submit a revised plan for approval. The revised plan shall include the following monitoring elements: Mass Emissions, Estuary/Wetlands, Water Column Toxicity, Bacteriological/Pathogen, Bioassessment, Reconnaissance, Land Use Correlation, and TMDL/303(d) Listed Waterbodies.

X. WATER QUALITY BENEFITS/COST ANALYSIS/FISCAL ANALYSIS

There are direct and indirect benefits from clean beaches, clean water, and a clean environment. It is difficult to assign a dollar value to the benefits the public derives from fishable and swimmable waters. In 1972, at the start of the NPDES program, only 1/3 of the U.S. waters were swimmable and fishable. In 2001, 2/3 of the U.S. waters meets these criteria. In the 1995, *Money* magazine survey of the "Best Places to Live", clean water and air ranked as the most important factors in choosing a place to live. Thus, environmental quality has a definite link to property values. Clean beaches and other water recreational facilities also attract tourists. It is estimated that on average, an out-of-state visitor spends approximately \$100.00 per day. Huntington Beach's 8.5-mile shoreline attracts 10 million visitors a year⁵. During the summer of 1999 and 2000 when the beaches were closed to water contact recreation, the beach communities reported multi-million-dollar losses in tourist revenues.

The true magnitude of the urban runoff problem is still elusive and any reliable cost estimate for cleaning up urban runoff would be premature. For urban storm water runoff, end-of-pipe treatments are cost prohibitive and are not generally considered as a technologically feasible option. Over the last decade, the permittees have attempted to define the problem and implemented best management practices to combat the problem. The costs incurred by the permittees in implementing these programs and policies can be divided into three broad categories (the costs indicated below are for the entire Orange County storm water program):

1. Shared costs: These are costs that fund activities performed mostly by the principal permittee under the Implementation Agreement. These activities include overall storm water program coordination; intergovernmental agreements; representation at the Storm Water Quality Task Force, Regional Board/State Board meetings and other public forums; preparation and submittal of compliance reports and other reports required under the NPDES permits and Water Code Section 13267, budget and other program documentation; coordination of consultant studies, co-permittee meetings; and training seminars. The overall costs increased from \$0.81M in 1996/97 to \$0.94M in 1999/00.
2. Individual Costs for DAMP Implementation: These are costs incurred by each permittee for implementing the BMPs (drainage facility inspections for illicit connections, drain inlet/catchbasin stenciling, public education, etc.) included in the DAMP. A number of programs and policies for non-point and storm water pollution controls existed prior to the urban storm water runoff NPDES program. However, the DAMP that was developed and implemented in response to the urban storm water runoff NPDES program required additional programs and policies for pollution control. These costs are attributable to DAMP implementation. These costs increased from \$2.6M in 1996/97 to \$6.9M in 1999/00.
3. Individual Costs of Pre-Existing Programs: These are costs incurred by each permittee for water pollution control measures that were already in existence prior to the urban storm water runoff NPDES program. These programs included recycling, litter control, street sweeping, drainage facility maintenance, and emergency spill response. The overall costs for these programs increased from \$48M in 1996/97 to \$79M in 1999/00.

⁵ Los Angeles Times, May 9, 2001

In addition to these expenditures, volunteer programs (such as the “Beach Cleanup Day”, “Pride Days”, “Coastal Cleanup Day”, etc.) also contributed to the urban runoff pollution control efforts.

The permittees identified the following funding sources (1999/00):

<i><u>FUNDING SOURCE</u></i>	<i><u>PERCENTAGE</u></i>
General Funds	66%
Gas Taxes	9%
Sewer/Storm Drain Maintenance Fee	7%
Sanitation Fees	5%
Benefit Assessment	3%
Special District Funds	1%
Other Sources	9%

XI. ANTIDegradation ANALYSIS

The Regional Board has considered whether a complete antidegradation analysis, pursuant to 40 CFR 131.12 and State Board Resolution No. 68-16, is required for these storm water discharges. The Regional Board finds that the pollutant loading rates to the receiving waters will be reduced with the implementation of the requirements in this order. As a result, the quality of storm water discharges and receiving waters will be improved. Since this order will not result in a lowering of water quality, a complete antidegradation analysis is not necessary, consistent with the federal and state antidegradation requirements.

XII. PUBLIC WORKSHOP

The Regional Board recognizes the significance of Orange County's Storm Water/Urban Runoff Management Program and will conduct, participate, and/or assist with any workshop during the term of this order to promote and discuss the progress of the storm water management program. The details of the workshop will be posted on the Regional Board's website, published in local newspapers and mailed to interested parties. Persons wishing to be included in the mailing list for any of the items related to this order may register their e-mail address and/or mailing address with the Regional Board office at the address given below.

XIII. PUBLIC HEARING

The Regional Board opened a public hearing regarding the proposed waste discharge requirements on Wednesday, December 19, 2001 at 9:00 a.m. at the City Council Chambers, City of Santa Ana. The public hearing was continued on Friday, January 18, 2002 at 9:00 a.m. at the City Council Chambers, City of Santa Ana, at which time Order No. R8-2002-0010 was adopted.

XIV. INFORMATION AND COPYING

Persons wishing further information may write to the above address or call Aaron Buck at (909) 782-4906. Copies of the application, proposed waste discharge requirements, and other documents

(other than those which the Executive Officer maintains as confidential) are available at the Regional Board office for inspection and copying by appointment scheduled between the hours of 8:30 a.m. and 4:00 p.m., Monday through Friday (excluding holidays).

XV. REGISTER OF INTERESTED PERSONS

Any person interested in a particular application or group of applications may leave his/her e-mail and/or mailing address and phone number as part of the file for an application. Copies of tentative waste discharge requirements will be mailed to all interested parties.

In addition to the permittees, comments were solicited from the following agencies and/or persons:

U. S. Environmental Protection Agency – Terry Oda / Eugene Bromley (W-5-1)
U.S. Army District, Los Angeles, Corps of Engineers - Permits Section
NOAA, National Marine Fisheries Service
U.S. Fish and Wildlife Service - Carlsbad
State Water Resources Control Board - Ted Cobb, Office of the Chief Counsel
State Water Resources Control Board – John Youngerman/Bruce Fujimoto, Division of Water Quality
State Department of Water Resources - Glendale
California Regional Water Quality Control Board, North Coast Region (1) – John Short
California Regional Water Quality Control Board, San Francisco Bay Region (2) – Dale Bowyer
California Regional Water Quality Control Board, Central Coast Region (3) – Jennifer Bitting
California Regional Water Quality Control Board, Los Angeles Region (4) – Wendy Phillips
California Regional Water Quality Control Board, Central Valley Region (5S) – George D. Day/Dani Berchtold
California Regional Water Quality Control Board, Central Valley Region (5R), Redding - Carole Crowe
California Regional Water Quality Control Board, Central Valley Region (5F), Fresno – Jarma Bennett
California Regional Water Quality Control Board, Lahontan Region (6SLT), South Lake Tahoe – Mary Fiore-Wagner
California Regional Water Quality Control Board, Lahontan Region (6V), Victorville – Gene Rodash
California Regional Water Quality Control Board, Colorado River Basin Region (7) – Abdi Haile/Pat Garcia
California Regional Water Quality Control Board, San Diego Region (9) – Bob Morris/Dave Gibson
State Department of Fish and Game - Long Beach
State Department of Health Services - Santa Ana
State Department of Parks and Recreation – Don Ito
Orange County Health Care Agency – Larry Honeybourne
South Coast Air Quality Management District, Diamond Bar - Caltrans, District 12, Santa Ana – Grace Pina-Garrett
Southern Pacific Railroad
Atchison, Topeka & Santa Fe Railway Company
Seal Beach Naval Weapons Station
Seal Beach Naval Reserve Center, Los Alamitos
U. S. Marine Corps Air Station, El Toro - National Forest Service
URS/Greiner - Bob Collacott
The Irvine Company - Sat Tamaribuchi
Building Industry Association – Tim Piasky/David Smith
Latham & Watkins – Paul Singarella
Best, Best, and Krieger – Anne Thomas
Southern California Association of Governments, Los Angeles - Tabi Hiwot

Universities and Colleges (Chancellor)

University of California, Irvine
California State University, Fullerton
Chapman College
Coastline College
Cypress College
Fullerton College
Irvine Valley College
Golden West College
Orange Coast College
Rancho Santiago College

School Districts (Superintendent)

Anaheim Elementary School District
Anaheim Union High School District
Brea-Olinda Unified School District
Buena Park Joint Union High School District
Centralia Elementary School District
Cypress Elementary School District
Fountain Valley Union High School District
Fullerton Elementary School District
Fullerton Joint Union High School District
Garden Grove Unified School District
Huntington Beach Elementary School District
Huntington Beach Union High School District
Irvine Unified Union High School District
La Habra Joint Union High School District
Los Alamitos Unified School District
Lowell Joint Union High School District
Magnolia Elementary School District
Newport-Mesa Unified School District
Ocean View Union High School District
Orange Unified School District
Placentia Unified School District
Santa Ana Unified School District
Savanna Union High School District
Tustin Unified School District
Westminster Union High School District
Yorba Linda Joint Union High School District

Hospitals (Administrator)

Anaheim General Hospital
Brea Community Hospital
Chapman General Hospital, Orange
Children's Hospital of Orange County, Orange
Coastal Communities Hospital, Santa Ana
Fairview Hospital
FHP Hospital, Fountain Valley
Fountain Valley Regional Hospital and Medical Center

Hoag Hospital, Newport Beach
Kaiser Foundation Hospital, Anaheim
Orange County Community Hospital, Buena Park
Pacifica Community Hospital, Huntington Beach
Placentia Linda Community Hospital
Santa Ana Hospital and Medical Center
St. Joseph's Hospital, Orange
U.C. Irvine Medical Center
Vencor Hospital of Orange County, Westminster
Whittier Hospital and Medical Center, Buena Park

Environmental Organizations

Lawyers for Clean Water – Kim Lewand/Daniel Cooper
Orange County Coastkeeper – Garry Brown
Defend the Bay – Bob Caustin
Sierra Club, Orange County Chapter
Sierra Club, Los Angeles Chapter - Dick Hingson
Natural Resources Defense Council (NRDC) – David Beckman
Cousteau Society
Amigos De Bolsa Chica
Audobon Sea & Sage Chapter
Huntington Beach Wetlands Conservancy
Surfrider Foundation- Nancy Gardner
Alliance to Rescue Crystal Cove – Laura Davik

Newspapers

Orange County Register – Pat Brennan
Los Angeles Times – Seema Metha
Press Enterprise –
Daily Pilot – Paul Clinton

Major Water/Wastewater Agencies

Santa Ana Watershed Project Authority – Joseph Grindstaff
Irvine Ranch Water District – General Manager
Los Alisos Water District - General Manager
El Toro Water District - General Manager
San Bernardino County Flood Control District - Naresh Varma
Riverside County Flood Control & Water Conservation District – Steve Stump/Mark Wills
L.A. County Department of Public Works - Gary Hildebrand
Orange County Sanitation Districts - Blake Anderson
Orange County Water District - Bill Mills
Metropolitan Water District - Ed Mean